

Peter Chang, Custom Family Gifts LLC
14622 Ventura Blvd
STE 102 PMB 2199
Tel: 612-644-7209 email: admin@customfamilygifts.com

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ JUN 25 2024 ★
BROOKLYN OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

In re DMCA Subpoena Section 512.h to Etsy, Inc

Miscellaneous Action No.

MISC 24-2568

**CUSTOM FAMILY GIFTS LLC REQUESTS TO THE CLERK FOR ISSUANCE OF THE
SUBPOENA TO ETSY, INC PURSUANT TO 17 U.S.C. § 512(H) TO IDENTIFY ALLEGED
INFRINGER**

Pursuant to 17 U.S.C. § 512(h), a provision of the Digital Millennium Copyright Act ("DMCA"), Applicant Peter Chang hereby requests that the Clerk of this Court issue a subpoena duces tecum directed to Etsy, Inc. (the "DMCA Subpoena Request").

An unknown individual who operates the shop at <https://www.etsy.com/shop/BeaverPrints> ("BeaverPrints ") has infringed my copyrights in 2-D artworks that are sold by me through my website <https://customfamilygifts.com> and through Etsy at <https://www.etsy.com/shop/customfamilygifts>.

This DMCA Subpoena Request is directed to BeaverPrints online service provider, Etsy, Inc, and seeks information sufficient to ascertain the identity of the anonymous infringer who has infringed my copyrights.

As a part of this subpoena request, I herewith file the following documents required by 17 U.S.C. § 512(h)(2): (1) A notification of claimed infringement complying with 17 U.S.C. § 512(c)(3)(A) (see Exhibit A further down); (2) A proposed subpoena to Etsy, Inc (see Exhibit B); and (3) A declaration from me affirming that "the purpose for which the subpoena is sought is to obtain the identity of an alleged infringer" and to protect rights under the Copyright Act. (see Exhibit C)

Having complied with the statutory requirements, I respectfully request that the Clerk of this Court expeditiously issue and sign the proposed subpoena attached hereto as Exhibit B and return it to me for service upon Etsy, Inc.

Dated: June 19, 2024
Respectfully Submitted,



Peter Chang

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Etsy, Inc
legal@etsy.com
LEGAL DEPARTMENT
117 Adams St
Brooklyn NY 11201

BROOKLYN OFFICE

MISC 24-2568

RE: DMCA Takedown Request

You are hosting content that infringes on our copyrights.
VA 2-282-333 R & M On The Road Together 1030

Authorized examples of VA 2-282-333 can be found here:
<https://www.etsy.com/listing/914606632/digital-artwork-only-milestones-map>

The infringing contents can be found here:
<https://www.etsy.com/shop/BeaverPrints> Banner & About section

<https://www.etsy.com/listing/1593962748/custom-paper-or-1-year-anniversary-gift>
<https://www.etsy.com/listing/1589887786/custom-1-year-anniversary-gift-for-him>
<https://www.etsy.com/listing/889006971/personalized-travel-memories-on-wood>
<https://www.etsy.com/listing/1608801277/travel-memories-on-wood-custom-5th-or>

☆ JUN 25 2024 ☆

BROOKLYN OFFICE

This letter is official notification under section 512(c) of the Digital Millennium Copyright Act ("DMCA"), and I seek that you discontinue to service this pirate and remove all infringing content from your site.

I am providing this notice in good faith and with the reasonable belief that rights my company owns or represents are being infringed. Under penalty of perjury I certify that the information contained in this notification is both true and accurate, and I have the authority to act on behalf of the owner of the copyright(s) involved.

Should you need more information please contact me directly. Thank you.

Digital Signature: Peter Chang

Custom Family Gifts LLC
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STE 102 PMB 2199
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Tel: +1 323 649 8124
admin@customfamilygifts.com
<https://customfamilygifts.com>
<https://customfamilygifts.etsy.com>

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EXHIBIT B: Proposed Subpoena

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK.**

In re DMCA Subpoena Section 512.h to Etsy, Inc

Miscellaneous Action No. MISC 24-2568

SUBPOENA TO PRODUCE DOCUMENTS AND INFORMATION

To: Etsy, Inc

YOU ARE COMMANDED to to produce information sufficient to identify the owner(s) and/or operator(s) of the shop found at <https://www.etsy.com/shop/BeaverPrints>, who has used your services to display, reproduce and distribute material infringing on my copyrights, including all owner names, addresses, telephone numbers, email addresses, logs of time & IP addresses used to log into Etsy, and names of other shops connected to the shop owner(s) and/or operator(s).

Place:

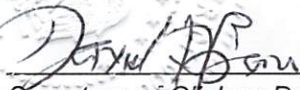
Peter Chang, Custom Family Gifts LLC
14622 Ventura Blvd
STE 102 PMB 2199
Sherman Oaks, CA, 91403; email: admin@customfamilygifts.com

Date: July 31st, 2024

Date: JUN 27 2024

CLERK OF COURT

BRENNAB. MAHONEY



Signature of Clerk or Deputy Clerk

DECLARATION OF THE
COMMISSIONER OF THE
DEPARTMENT OF CORRECTIONS

I, the undersigned, am the Commissioner of the Department of Corrections, and I am making this declaration in my official capacity.

I hereby declare that the information contained in the foregoing is true and correct, and that I am not aware of any other information that would materially affect the truthfulness of the foregoing.

Witness my hand and the seal of the Department of Corrections at Albany, New York, this 25th day of June, 2024.

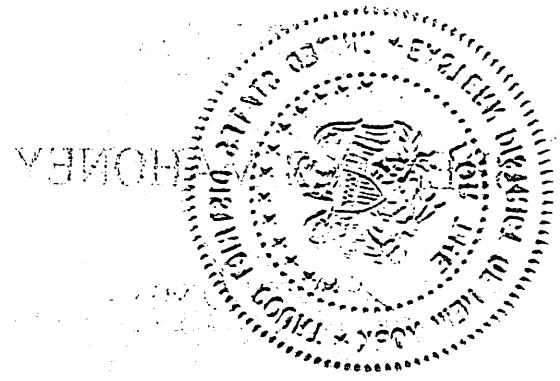
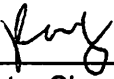


EXHIBIT C: Declaration

1. Peter Chang, am the founder and operator of the business Custom Family Gifts LLC and I own and represent the rights being infringed upon found at <https://customfamilygifts.com> and <https://www.etsy.com/shop/customfamilygifts/>
2. An unknown party who owns and operates the Etsy store found at <https://www.etsy.com/shop/BeaverPrints> ("BeaverPrints ") is reproducing and distributing infringing works without authorization. BeaverPrints is using the services of Etsy, Inc to promote and distribute the works which are infringing on my rights.
3. The purpose for which the DMCA Subpoena Request is made is to obtain the identity of the unknown party who owns and operates BeaverPrints .
4. Any information obtained in connection with this action will be used only for the purpose of protecting my rights under title 17 of the United States Code.

I declare under penalty of perjury under the Laws of the United States of America that the foregoing is true and correct.



Peter Chang
June 19, 2024